



Advocates for Workplace Fairness

September 5, 2018

Via CM/ECF

The Honorable Robert W. Lehrburger
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *Chen-Oster, et al. v. Goldman, Sachs & Co.*, No. 10 Civ. 6950 (AT) (RWL)

Dear Judge Lehrburger:

On behalf of Plaintiffs and the Class, we write to respectfully request a minor modification of the current discovery schedule, adopted by the Court on July 16, 2018. Defendants oppose this request. Under the current schedule, Defendants' statistical expert must be deposed by September 21, 2018, and Plaintiffs' reply expert report must be served by October 4, 2018. ECF No. 616. Plaintiffs request a two-week extension for the deposition of Defendants' expert, until October 5, and a one-week modification of the deadline for Plaintiffs' reply expert report, until October 11. Plaintiffs do not propose adjusting any other deadlines.

Good cause exists for this slight modification of the existing schedule. On August 29th, Defendants produced a statistical report from Michael Ward – but waited until late last night to provide the actual backup data files necessary for Plaintiffs and Plaintiffs' expert to adequately review and evaluate the analyses. This delay prejudices Plaintiffs' ability to prepare for the deposition of Defendants' expert, and therefore additional time is necessary to review these files prior to Dr. Ward's deposition. In addition, Plaintiffs' counsel have scheduling conflicts the week of September 21 that were not known at the time the parties requested the previous schedule adjustment on July 13. Defendants did not articulate any reason for opposing this slight extension to these internal deadlines.

Accordingly, Plaintiffs request that the Court grant a slight adjustment for the deadline to depose Defendants' expert, until October 5, 2018, and the deadline to serve Plaintiffs' reply expert report, until October 11, 2018. We thank the Court for its attention to this matter.

Respectfully,

A handwritten signature in black ink, appearing to read "ATK".

Adam T. Klein

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